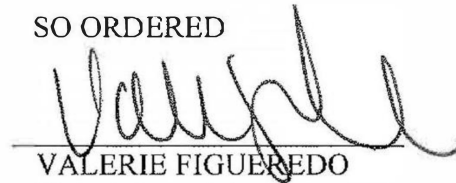




From the desk of:
James M. Kramer, Esq.

VIA ECF
 Hon. Valerie Figueredo
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

SO ORDERED



VALERIE FIGUEREDO

United States Magistrate Judge

Dated: 4-21-2023

The parties are directed to submit a joint letter by **May 31, 2023** updating the Court as to the status of discovery.

Re. Gref v. Am. Int'l Indus., et al., 20-cv-05589

Dear Judge Figueredo,

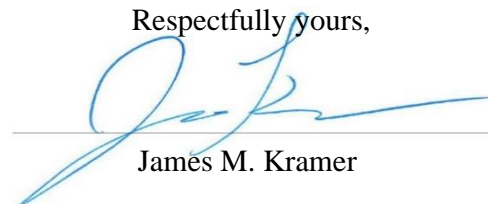
Plaintiff writes in accord with the Court's request for a joint update on the status of discovery since the parties' last update, as well as anticipated next steps in the upcoming month.

With respect to the recently discovered bottle of Clubman talc, Plaintiff has continued to offer Defendant its share of the contents of the bottle for testing, and awaits details from Defendant confirming same. AII is coordinating with its experts on the logistics of taking possession of the Clubman container from MAS laboratories. Additionally, Plaintiff's mother and stepfather, who discovered the bottle in their garage, will be deposed next week on matters related to the recently disclosed container of Clubman talc. To the extent that AII claims any further fact depositions are required on this issue beyond Plaintiff's mother and stepfather, the parties will meet and confer in an effort to address any issues.

In the upcoming month, the parties expect that their respective experts will complete their analysis of the contents of Clubman talc produced in this case, which will be followed by certain expert depositions concerning their testing/analysis and related issues. Additionally, the parties stand ready to address other scheduling matters, including whether Defendants are entitled to a continuation deposition of Dr. Jacqueline Moline and any additional deposition dates, which will be determined in accordance with this Court's anticipated ruling on this issue.

As always, we are available at Your Honor's convenience if the Court has any questions or would like additional information.

Respectfully yours,



James M. Kramer

cc: All Counsel of Record (via ECF)

We stand for our clients.

HEADQUARTERS

One Court Street
 Alton, IL 62002
 TEL: (618) 259-2222
 FAX: (618) 259-2251

NEW YORK

112 Madison Avenue
 New York, NY 10016
 TEL: (212) 784-6400
 FAX: (212) 213-5949

CHICAGO

230 W. Monroe
 Suite 2221
 Chicago, IL 60606
 TEL: (312) 759-7500
 FAX: (312) 759-7516

SAN FRANCISCO

455 Market
 Suite 1150
 San Francisco, CA 94105
 TEL: (415) 536-3986
 FAX: (415) 537-4120

LOS ANGELES

100 N. Sepulveda Blvd.
 Suite 1350
 El Segundo, CA 90245
 TEL: (310) 322-3555
 FAX: (310) 322-3655

ST. LOUIS

231 S. Bemiston
 Suite 525
 St. Louis, MO 63105
 TEL: (800) 479-9533